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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,  
  
Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Judge: Michael B. Kaplan

**MESOTHELIOMA CLAIMANTS' JOINDER TO OBJECTION OF THE UNITED STATES TRUSTEE TO DEBTOR'S MOTION FOR AN ORDER (I) DECLARING THAT THE AUTOMATIC STAY APPLIES OR EXTENDS TO CERTAIN ACTIONS AGAINST NON-DEBTORS, (II) PRELIMINARILY ENJOINING SUCH ACTIONS, AND (III) GRANTING A TEMPORARY RESTRAINING ORDER EX PARTE  
PENDING A HEARING ON A PRELIMINARY INJUNCTION**

The below law firm signatories herein (jointly "Mesothelioma Claimants Counsel"),<sup>1</sup> on behalf of their various talc mesothelioma claimants ("Mesothelioma Claimants") through their undersigned counsel, hereby submit this Joinder Objection to the objection filed by Andrew R. Vara, the United States Trustee for Regions 3 and 9 ("U.S. Trustee") in the above-captioned case, objecting to the motion of Debtor LTL Management, LLC ("Debtor") for an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order *Ex Parte* Pending a Hearing on a Preliminary Injunction [Dkt. 38.], which is incorporated herein by

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<sup>1</sup> The Mesothelioma Claimants Counsel collectively represent over a thousand Mesothelioma Claimants, both filed and unfiled.

reference. For the reasons cited in the U.S. Trustee Objection, the Mesothelioma Claimants respectfully request that this Court deny Debtor's motion in its entirety, and for such other relief as to which Mesothelioma Claimants may be entitled.

Further, the Mesothelioma Claimants continue to object to Debtor's assertion that "the proposed plan of reorganization agreed to by thousands of claimants" being "in the best interest of all parties." [Debtor's Statement Regarding Refiling of Chapter 11 Case. Dkt. 3 at 9.] There continues to be no support provided for the assertion that 60,000 "claimants" have supported the Debtor's proposed plan.<sup>2</sup> Moreover, the Mesothelioma Claimants were not involved in, do not support, and assert it is not in their best interest to extinguish their 7th Amendment rights to a trial by jury. The Mesothelioma Claimants reserve their rights to modify or supplement this Joinder as necessary and appropriate.

Dated: April 17, 2023

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<sup>2</sup> Debtor's Statement Regarding Refiling of Chapter 11 Case. [Dkt. 3 at 2.]

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